

UNITED STATES DISTRICT COURT
IN THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG, PA

SEP 09 2015

MARIA E. ELKINS, CLERK

UNITED STATES OF AMERICA)

NO. 4:14-CR-254

v.)

CHRISTOPHER G. LEE)

(JUDGE MATTHEW W. BRANN)

Defendant.)

(ELECTRONICALLY FILED)

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

From on or about January 1, 2014 to on or about June 22, 2014, in Centre County, Pennsylvania and within the Middle District of Pennsylvania and elsewhere, the defendant,

CHRISTOPHER G. LEE

knowingly persuaded, induced, and enticed John Doe #1, age 17, to travel in interstate and foreign commerce, to engage in any sexual activity for which any person can be charged with a criminal offense, including indecent assault.

It is a violation of the Pennsylvania Consolidated Statutes, Title 18, Section 3126(a)(1), to commit indecent assault, which occurs if a person has indecent contact with a complainant without the complainant's consent.

All in violation of Title 18, United States Code, Section 2422(a).

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

From on or about January 1, 2014 to on or about June 22, 2014, in Centre County, Pennsylvania and within the Middle District of Pennsylvania and elsewhere, the defendant,

CHRISTOPHER G. LEE

did knowingly transport and caused to be transported John Doe #1, age 17, an individual who had not attained the age of 18 years, in interstate and foreign commerce, with the intent that John Doe #1 engage in sexual activity for which any person can be charged with a criminal offense, including indecent assault.

It is a violation of the Pennsylvania Consolidated Statutes, Title 18, Section 3126(a)(1), to commit indecent assault, which occurs if a person has indecent contact with a complainant without the complainant's consent.

All in violation of Title 18, United States Code, Section 2423(a).

THE GRAND JURY FURTHER CHARGES:

COUNT THREE

From on or about January 1, 2014 to on or about June 30, 2014, in Centre County, Pennsylvania and within the Middle District of Pennsylvania and elsewhere, the defendant,

CHRISTOPHER G. LEE

knowingly received visual depictions involving minors, including prepubescent minors under the age of 12 years, engaging in sexually explicit conduct, that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT FOUR

On or about October 2, 2014, in the Middle District of Pennsylvania and elsewhere, the defendant,

CHRISTOPHER G. LEE

knowingly possessed and caused to be possessed images of child pornography, as defined in Title 18, United States Code, Section 2256, depicting minors engaged in sexually explicit conduct, including prepubescent minors or minors who had not attained 12 years of age, that had been mailed, shipped and transported in interstate or foreign commerce by any means, including by computer; that is Lee's devices contained images depicting the lascivious exhibition of the genitals and pubic area of numerous minors.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B); Title 18, United States Code, Section 2252A(b)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT FIVE

From on or about 2005, continuing to on or about 2006, in the Middle District of Pennsylvania and elsewhere, the defendant,

CHRISTOPHER G. LEE

did intentionally and knowingly use, persuade, induce, entice or coerce a minor to take part in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that the materials for said production had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including a computer, hard drive or thumb drive.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT SIX

From on or about October 2, 2014, continuing to in or about November 2014, in the Middle District of Pennsylvania and elsewhere, the defendant,

CHRISTOPHER G. LEE

aided and abetted by others, did corruptly attempt to alter, destroy, mutilate, and conceal a record or other object, specifically the contents of a cellular telephone, with the intent to impair its integrity and availability for use in an official proceeding, specifically the federal investigation of LEE regarding child exploitation offenses.

All in violation of Title 18, United States Code, Section 1512(c)(1); Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SEVEN

From in or about 2005 through in or about 2006, in Centre County, Pennsylvania and within the Middle District of Pennsylvania and elsewhere, the defendant,

CHRISTOPHER G. LEE

did knowingly transport, and caused to be transported John Doe #2, age 14, in interstate and foreign commerce, with the intent that John Doe #2 engage in sexual activity for which any person can be charged with a criminal offense, including statutory sexual assault.

It is a violation of the Pennsylvania Consolidated Statutes, Title 18, Section 3122.1, to commit statutory sexual assault, which is a felony of the first degree, and occurs when a person engages in sexual intercourse with a child under 16 years old, the person is 11 or more years older than the child and the child and the person are not married to each other.

All in violation of Title 18, United States Code, Section 2423(a).

THE GRAND JURY FURTHER CHARGES:

COUNT EIGHT

Beginning in or about 2005 continuing to in or about 2006, within the Middle District of Pennsylvania and elsewhere, the defendant,

CHRISTOPHER G. LEE

knowingly persuaded, induced, and enticed John Doe #2, age 14, to travel in interstate and foreign commerce, to engage in any sexual activity for which any person can be charged with a criminal offense, including statutory sexual assault.

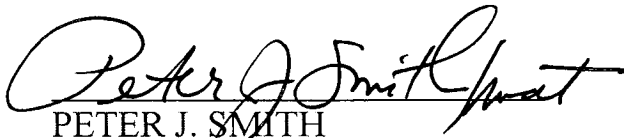
It is a violation of the Pennsylvania Consolidated Statutes, Title 18, Section 3122.1, to commit statutory sexual assault, which is a felony of the first degree, and occurs when a person engages in sexual intercourse with a child under 16 years old, the person is 11 or more years older than the child and the child and the person are not married to each other.

All in violation of Title 18, United States Code, Section 2422(a).

A TRUE BILL


FOR PERSON

9/9/2015
DATE


PETER J. SMITH
UNITED STATES ATTORNEY